

**From:** [Stephen Tzhone](#)  
**To:** [Carlos Sanchez](#); [Charles Faultry/R6/USEPA/US@EPA](#)  
**Cc:** [Garyg Miller](#); [Jessica Hernandez](#); [Robert Werner/R6/USEPA/US@EPA](#); [Philip Turner/R6/USEPA/US@EPA](#)  
**Subject:** fyi: Dioxin/Furan Testing and Evaluation from EPA Water  
**Date:** 09/07/2011 02:36 PM  
**Attachments:** [2011\\_08\\_09\\_lab results HSC.pdf](#)  
[2011\\_07\\_20\\_HSC\\_Lost Lake\\_Peggy Lake.pdf](#)  
[2009\\_08\\_31\\_EPA to USACE\\_SJRWP permits boundary.pdf](#)

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Carlos, Charles:

EPA Water will be taking a more active role on the watershed (see below). However, the materials from the USACE dredge operations may still be disposed inside the special process area around SJRWP (i.e. Lost Lake)... and the sampling requirements for disposal inside this area were not met.

Should we recommend Sam to place a call to USACE Colonel Sallese, POHA Charlie Jenkins, and/or TCEQ L'Oreal Stepney? or a joint 6WQ/6SF formal letter on this issue?

Thanks,

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▼ Jessica Franks---09/07/2011 08:53:08 AM---Good morning Dana And David. Normally we would be talking with Nichole Hauser, but she is on materni

From: Jessica Franks/R6/USEPA/US  
To: [dblume@poha.com](mailto:dblume@poha.com), [dcasebeer@poha.com](mailto:dcasebeer@poha.com)  
Cc: Karen McCormick/R6/USEPA/US@EPA, Sharon Parrish/R6/USEPA/US@EPA, Stephen Tzhone/R6/USEPA/US@EPA  
Date: 09/07/2011 08:53 AM  
Subject: Dioxin/Furan Testing and Evaluation

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Good morning Dana And David,

Normally we would be talking with Nichole Hauser, but she is on maternity leave. We understand her boss' last day was Friday and that the work load has been distributed among several individuals including the two of you until she returns.

This email is a follow up to the call Karen McCormick, Dana Blume and I had yesterday afternoon. First I'll give a little background information so everyone is on the same page. EPA received a routine maintenance dredging notice from the Galveston District (attached). The maintenance dredging is for the Houston Ship Channel - Exxon to Carpenter Bayou with placement of dredged material into Lost Lake and Peggy Lake. The proposed sediments for dredging were sampled and analyzed (see attached) for dioxins/furans as required in the Permit Conditions agreement between EPA, TCEQ, and Port of Houston Authority (POHA) signed in 2009. I forwarded the data to Stephen Ellis with TCEQ for evaluation regarding the

placement of dredged material into Lost Lake. There was concern that the number of samples collected were not in agreement with the 2009 Permit Conditions. Placement of the dredged material into Lost Lake falls under the 2009 Permit Conditions and therefore would be between TCEQ, the PHA and EPA Superfund.

Placement of the dredged material into Peggy Lake would be between the POHA and the Galveston District because Peggy Lake is outside of the Area of Concern for the San Jacinto Waste Pits and is an upland confined placement area. Dana informed EPA that the POHA Sediment Testing Requirements (EPA received from the POHA in a letter this spring) for placement of dredged material into POHA owned placement areas pertains only to private entities and that there is a different agreement between the Galveston District and POHA regarding the required number of samples, i.e. one sample for every 5,000 linear feet of channel to be dredged. EPA did notice that although dioxin and furan testing is required, there is no reporting limit in the table in the Sediment Testing Requirements document. Dana mentioned that the POHA is currently using the dioxin numbers in the 2009 Permit Conditions for evaluation of dioxin/furan data outside of the Area of Concern because there is nothing else in place at the moment.



2011\_08\_09\_lab results HSC.pdf



2011\_07\_20\_HSC\_Lost Lake\_Peggy Lake.pdf

On a similar note, because of the presence of dioxins and furans in the Houston Ship Channel/Galveston Bay Area, EPA began requiring dioxin and furan testing of pre-dredge material prior to placement in the Galveston ODMS or any beneficial use area. See attached letter dated August 31, 2010. Testing requirements are more stringent if the dredged material is to be placed into the ODMS; i.e. bioaccumulation testing is required if dioxins/furans are detected in the sediment chemistry analysis.



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We are interested in talking about how the POHA evaluates the dioxin/furan data it receives on pre-dredged material for placement in POHA owned unconfined placement areas in Galveston Bay.

We are currently putting together a team to review EPA Region 2's dioxin/furan tissue levels they use for evaluation of pre-dredged material for placement in an ODMS.

Please let me know when you are available for a call. I will be back in the office tomorrow and for the remainder of the week.

Thanks,

Jessica

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Jessica L. Franks, Ph.D. (6WQ-EC)

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